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9
10 **UNITED STATES BANKRUPTCY COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**
12

13 **In re**

14 CREATIVE CAPITAL LEASING
15 GROUP, LLC

16 Bk. No.: 07-04977-LT11

17 Chapter 11

18 **RESPONSE OF CORPORATE**
19 **RECOVERY ASSOCIATES TO THE**
20 **COURTS TENTATIVE RULING ON**
21 **THE FIFTH AND FINAL**
22 **APPLICATION OF CORPORATE**
23 **RECOVERY ASSOCIATES FOR**
24 **COMPENSATION AND**
25 **REIMBURSEMENT OF EXPENSES**

26 Date: March 9, 2017

27 Time: 9:30 a.m.

28 Dept: 3

Judge: Hon. Laura S. Taylor

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In accordance with the Court's tentative ruling, Corporate Recovery Associates ("Applicant") submits concurrently herewith a proposed order allowing and authorizing payment of fees and costs of Applicant consistent with the Court's tentative ruling.

1 Applicant respectfully requests that the Court enter such order.

2 By the Fifth and Final Application of Corporate Recovery Associates for
3 Compensation and Reimbursement of Expenses (the “Application”), Applicant requested
4 that the Court allow and authorize payment to Applicant of additional fees and costs that
5 may be incurred by Applicant associated with the winding up and the closing of this case
6 in an amount not to exceed \$7,000.00 (“Supplemental Fees and Costs”). Through
7 inadvertence, however, the notice of the hearing on the Application (the “Notice”) did not
8 disclose Applicant’s request for the Supplemental Fees and Costs. By reason of the failure
9 to disclose the request for the Supplemental Fees and Costs in the Notice, by the Court’s
10 tentative ruling, the Court indicated its intention to deny the request for the Supplemental
11 Fees and Costs.
12

13
14 Applicant respectfully requests that the Court reconsider its tentative ruling
15 regarding Applicant’s Supplemental Fees and Costs and instead authorize Applicant to
16 seek allowance and payment of the Supplemental Fees and Costs by Applicant’s serving
17 an amended notice that will disclose properly Applicant’s request for the Supplemental
18 Fees and Costs in accordance with the following procedures:
19

- 20 1. Applicant will serve on all parties entitled to receive notice a copy of
21 the amended notice disclosing the request for payment of the
22 Supplemental Fees and Costs.
23
- 24 2. In the event that no objection to the request for payment of the
25 Supplemental Fees and Costs is filed within fourteen days of service of
26 the amended notice, Applicant may file a declaration of non-opposition
27 and a proposed order allowing and authorizing payment of the
28


1 Supplemental Fees and Costs, with no need for any further notice or
2 hearing before the Court.

- 3 3. If an objection to the request for the Supplemental Fees and Costs is
4
5 timely filed, Applicant will set the matter for hearing before the Court.

6 Applicant respectfully submits that the proposed procedures are fair and provide to
7 all parties-in-interest an adequate opportunity to assert any objection to Applicant's
8 Supplemental Fees and Costs.

9
10 Respectfully submitted this 8th day of March 2017

11 CORPORATE RECOVERY ASSOCIATES

12
13 BY: 
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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF CALIFORNIA	COURT USE ONLY
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Telephone No. Jeffrey D. Cawdrey, Esq. (SBN: 120488) (619) 696-6700 GORDON & REES, LLP 101 West Broadway, Suite 2000 San Diego, California 92101	
In Re Creative Capital Leasing Group, LLC	Bankruptcy Case No.: 07-04977-PB7
ATTORNEYS FOR Leslie T. Gladstone, Chapter 7 Trustee	

PROOF OF SERVICE

I, the undersigned, say: I am over 18 years of age, employed in the County of Dallas, Texas, in which the within-mentioned service occurred; and that I am not a party to the subject cause. My business address is 2100 Ross Avenue, Suite 2800, Dallas, Texas 75201.

On **March 8, 2017**, I served the following document(s):

RESPONSE OF CORPORATE RECOVERY TO THE COURT'S TENTATIVE RULING ON THE FIFTH AND FINAL APPLICATION OF CORPORATE RECOVERY ASSOCIATES

by the following means:

SEE SERVICE LIST

- (X) BY MAIL. I am familiar with this firm's practice of collection and processing correspondence for mailing with the United States Postal Service, and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business pursuant to Code of Civil Procedure §1013a.
- () BY FAX. In addition to service by mail as set forth above, a copy of said document(s) were also delivered by facsimile transmission to the addressee pursuant to Code of Civil Procedure §1013(e).
- () BY PERSONAL SERVICE. I caused said documents to be hand-delivered to the addressee pursuant to Code of Civil Procedure §1011.
- () BY FEDERAL EXPRESS. I deposited said document(s) in a box or other facility regularly maintained by the express service carrier providing overnight delivery pursuant to Code of Civil Procedure §1013(c).
- (X) BY ECF: I caused all of the pages of the above-entitled document(s) to be electronically filed and served on designated recipients through the Electronic Case Filing system for the above-entitled case. The file transmission was reported as successful and a copy of the Electronic Case Filing Receipt will be maintained with the original document(s) in our office...

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **March 8, 2017**.

/s/Denise Houser
Denise Houser

SERVICE LIST

07-04977-LT7 Notice was electronically sent to:

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